

REMARKS

The Office Action of August 25, 2006 has been reviewed and the comments therein were carefully considered. Claims 18-20, 33, 56, 66, 67, 69-71, 84, 107, 116 and 120-123 are pending in this application. Claims 18-20, 33, 56, 66, 67, 69-71, 84, 107, 116 and 120-123 stand rejected. No new matter has been added. As explained in more detail below, the Applicants respectfully submit that the pending claims are in condition for allowance and respectfully solicit such action.

Rejections under 35 U.S.C. § 103

Claims 18-19, 33, 56, 66, 67, 69, 84, 107, 116, 120 and 122 stand rejected under 35 USC Section 103(a) as being unpatentable over Block (US Publication 2002/0010604 A1) in view of Walker et al. (US 5,794,207) and further in view of LaBrie et al. (US 2002/0047861 A1) and Lapstun et al. (US 6,728,000 B1).

Block is asserted to teach the step of using a portable trusted terminal of a purchaser which is in wireless communication with a server of a provider of the tickets to select a ticket to be purchased. (Office Action dated August 25, 2006; page 2) LaBrie is then asserted to teach the step of saving in a memory information regarding the purchase from which the purchased ticket is output by an authorized device selected by the mobile personal trusted device with authorization being determined by the server of the provider. (Id. at 3)

The Applicants respectfully traverse the rejection because A) LaBrie does not teach the asserted step and B) even assuming, arguendo, that LaBrie discloses the asserted step, applying LaBrie against the teachings of Block would “destroy the reference”. In fact, applying Block would expressly teach away from using any of the alleged teachings of LaBrie, thus one skilled in the art would not be motivated to make such a combination.

A. LaBrie does not teach the asserted step

The Applicants respectfully traverse the assertion that LaBrie teaches the step of saving in a memory information regarding the purchase from which the purchased ticket is output by an authorized device selected by the mobile personal trusted device with authorization being determined by the server of the provider. Specifically, the Office Action alleges that paragraphs 0048, 0070, 0072 and 0075, when combined, teach the limitation. The Applicants respectfully

disagree that combining the 4 paragraphs provides an enabling disclosure to teach or suggest the limitation. First, paragraph 48 does indicate that an access point can be “any device providing a user interface at or through a network”, which does encompass a mobile trusted device, the remaining specification, however, makes it clear that the printing may only be done at fixed locations and only at a printer affixed to that fixed location. As noted by the Office Action, paragraph 0075 recites that “[t]he subsystem may provide the user the option of obtaining tickets and/or of placing a reservation (if necessary) for a visit to the attraction. (Tickets may be ordered for subsequent pick-up by the user or printed by a printer at any authorized access point.)”. The Applicants respectfully disagree that the phrase “printed by a printer at any authorized access point” teaches the limitation. There is at least no indication of saving in a memory information regarding the purchase from which the purchased ticket is output by an authorized device. Rather the tickets is printed to an attached printer (the printer at the access point). Indeed, the reference merely indicates that any of the individual access points may be utilized to print a ticket at that access point the user is at. Nothing in LaBrie teaches otherwise. If the rejection is maintained the Applicants respectfully request the location of enabling disclosures indicating the user of a mobile terminal may select any printer at any access point.

Moreover, from the remaining specification, it is clear the reference to printing from the access point is when a user is physically present at a **stationary** access point and not utilizing a mobile electronic device (in which case the user may have to pick up the tickets as referenced in paragraph 0075). For example, paragraph 0043 recites the advantage of “offering the convenience of access points in close proximity to where users spend the majority of their time, the “common areas” of the site (e.g. resort or cruise ship) or alternatively by using mobile electronic devices with wireless networking technologies provided to visitors to the site or brought to the site by the user.” (Paragraph 0043). Thus, “mobile electronic devices” may be used alternatively to the stationary “access points” that may strategically located throughout the common areas or the like. This is repeated throughout the LaBrie as shown below.

1. Usage of “Access Point”

“[T]he Navigator system provides a user with the ability to identify various destinations on the cruise ship and provides instructions in the form of directions from one destination (e.g. an access point providing a user interface such as at a kiosk) to another destination...Through the

user interface, the user at a present location (i.e. the location of the access point presenting the user interface) will then select a destination”. (Paragraph 0061)

“Using the Navigator system, a user may approach any one of several conveniently-placed access points (e.g. kiosk) and through the user interface obtain directions to any destination on the site.” (Paragraph 0062)

2. Usage of “Mobile” or “Portable Electronic Devices”

“According to a particularly preferred embodiment, the Navigator system may include an interface with a Global Positioning System (GPS) that will provide the user real time positioning and tracking information about a passenger's exact location within a cruise ship or within a particular site. Using the Navigator system, a passenger may receive a location signal instantaneously from a GPS satellite, from any location within the cruise ship, through a portable electronic device such as a handheld computer, PDA, or similar device equipped with a GPS receiver”.

Thus, if a user utilizes an access point, there is no mobile personal trusted device as claimed in the rejected claims being utilized (nor can there be a “user terminal” as claimed). Furthermore, neither the term “mobile electronic device” nor “portable electronic device” is referenced in the cited paragraphs in regards to printing documentation nor is there any indication the output device is selected by the user of the trusted terminal.

Because claims 33, 56, 69, 84, 107, 116, 120, and 122 are rejected “under the same rationale”, the Applicant submits the same reasons of allowance for those claims. For at least this reason, the Applicant respectfully requests reconsideration and withdrawal of the rejection.

B. Applying LaBrie against the teachings of Block would “destroy the reference”

As discussed above, the Applicants respectfully disagree that LaBrie teaches or otherwise discloses the asserted limitation. Nonetheless, even if the Office disagrees, the Applicants respectfully submit that applying the asserted teachings of LaBrie in combination of Block would destroy the reference. Specifically, there is no teaching or suggestion that the tickets of Block are outputted by an authorized device selected by a mobile personal trusted device. In fact, the only output referenced states: “Tickets can be printed out either at AirportAmerica Kiosks 11 (see FIG. 1) located strategically throughout the airport through a partnering with the

local sponsor airport, or on a computer printer.” (Para. 0668, lines 13-17) First, if a user (“member”) utilizes a portable device to buy a ticket, there is no teaching the portable device can select which AirportAmerica Kiosk it is printed out at.

In an alternative scenario, if the user purchases the tickets directly at the AirAmerica Kiosk, there is no mobile personal trusted device as claimed being utilized (nor can there be a “user terminal” as claimed). As cited above, the Kiosks are “located strategically throughout the airport” and the user must physically retrieve the printout at the Kiosk they are using (*see, e.g.*, para. 0705, stating: “He stops at the AA kiosk 11 near his gate...receives page one of hard copy of a reservation”) Thus further suggesting the Kiosks are not portable or mobile.

In fact, when confronted with the above argument in the preceding Response, the assertion that Block teaches the step was dropped. Thus, if one skilled in the art was following the teachings of Block, they would not be motivated to incorporate the step of saving in a memory information regarding the purchase from which the purchased ticket is output by an authorized device selected by the portable trusted terminal with authorization being determined by the server of the provider. Rather, as discussed above, incorporating such a step would “destroy” the advantages and teachings of Block.

Because claims 33, 56, 69, 84, 107, 116, 120, and 122 are rejected “under the same rationale”, the Applicant submits the same reasons of allowance for those claims. For at least this reason, the Applicant respectfully requests reconsideration and withdrawal of the rejection.

Claims 121 and 123 stand rejected under 35 USC Section 103(a) as being unpatentable over Block (US Publication 2002/0010604 A1) in view of Walker et al. (US 5,794,207) and further in view of LaBrie et al. (US 6,728,000 B1) and further in view of Official Notice.

For at least the same reasons set forth above, the Applicants respectfully disagree that either Block or LaBrie, collectively or individually teach, disclose, or suggest the subject matter of claims 121 and 123, and therefore respectfully request reconsideration.

CONCLUSION

Favorable reconsideration of this application is respectfully requested. The Examiner is invited to contact the undersigned should it be deemed necessary to facilitate prosecution of the application.

Respectfully submitted,

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By:



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